UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: BOBBI DEHASS BRUMBAUGH and	:	CHAPTER 13
MATTHEW J. BRUMBAUGH	:	
Debtor(s)	:	
	:	
CHARLES J. DEHART, III	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
BOBBI DEHASS BRUMBAUGH and	:	
MATTHEW J. BRUMBAUGH	:	
Respondent(s)	:	CASE NO. 4-18-bk-00228

TRUSTEE'S OBJECTION TO SECOND AMENDED CHAPTER 13 PLAN

AND NOW, this   12th   day of December, 2018, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1.   Debtor(s)' plan violates 11 U.S.C. Sec. 1322(a)(1) in that the debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required.   More specifically,

Trustee alleges and avers that debtor(s)' disposable income is greater than that which is committed to the plan based upon the Means Test calculation and specifically disputes the following amounts:

a.   Plan does not submit income that will be available to
make plan payments when the retirement loans are paid off.
b.   Child care – Line 21.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

a.   Deny confirmation of debtor(s) plan.
b.   Dismiss or convert debtor(s) case.
c.   Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Agatha R. McHale
Attorney for Trustee

<u>CERTIFICATE OF SERVICE</u>

   AND NOW, this 12th day of December, 2018, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Sean Patrick Quinlan, Esquire
2331 Market Street
Camp Hill, PA 17011

        /s/Deborah A. Behney
        Office of Charles J. DeHart, III
        Standing Chapter 13 Trustee